



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

July 24, 2002

Reply To
Attn Of: ECL-113

Commander, Ft. Lewis
Directorate of Public Works
ATTN: AFZH-DEQ MS 17 (Mr. Eric Waehling)
Building 2012, Room 323
Ft. Lewis, WA 98433-9500

(sent via e-mail and regular mail)

Subject: Comments on Level 1 Screening Results

Dear Eric:

Please find EPA's comments on the subject results enclosed. Let me know if you have any questions or concerns at (206) 553-1220.

Sincerely,

Sean Sheldrake, Project Manager

Enclosure

cc: Greg Johnson, Ecology
Ben Forson, Ecology

via e-mail only
“

EPA Comments on Level 1 Screening Outcomes Camp Bonneville Vancouver, WA

General Comment. Please ensure that AOPCs/AOCs within the planned boundaries of the regional park, but east of Lacamas Creek, are given “High” future land use intensity.

General Comment. It does not appear as though information gathered prior to the 2001 reconnaissance has not been adequately considered in the evaluation of many of these areas. For example, see comments on UXB Grid 289 and 1967_TEC_IMP_10.

General Comment - Graphics. It would be helpful if the graphics of the screened areas indicated the Level 1 outcomes (possibly through color coding) for each of the sites.

General Comment - Level 1 Worksheets. Please check worksheets for completeness and accuracy. There are many worksheets that do not have the total acreage filled out in item #3 (some of them are pointed out in the comments below); others are missing coordinate entries or have easting and northing values that do not seem correct (again, some are pointed out in comments below).

Target Area Comments

Identification of AOCs Within the Impact Area. The West Impact Area Car Target 2, Combined Impact Area 1 and Combined Impact Area 2 were all identified based solely on the results of the 2001 Reconnaissance Investigation. The loss mechanism for target areas indicates sub-surface contamination. Furthermore, the ground scars identified in the TEC report indicate that scarification, almost certainly associated with range maintenance, occurred in the impact area. These scarification activities could remove any surface evidence of a target area. Therefore, a surface reconnaissance does not meet the Level 1 sufficiency of information requirements for this type of loss mechanism. All of the information about the Impact Area, including the results of the previous EE/CA investigation, the TEC analysis, and historic data, should be evaluated, along with the 2001 Reconnaissance results to determine areas that require additional information.

M203 Grenade Range and Practice Mortar Range AOCs. Please confirm the acreage for these two sites.

Range Safety Fan Comments

General Comment. The final graphic for these areas should show the spatial relationship between the large artillery and mortar range safety fans and the other types of AOCs contained within the fans.

1967 TEC IMP 6, 1967 TEC IMP 10. The total areas for these AOCs are missing from item 3 on the worksheet.

1967 TEC IMP 2. The TEC report describes this as a “cleared area with objects”. This description is indicative of a potential target area. This AOC should be reclassified as a target area.

1967 TEC IMP 10. The TEC report describes this area as containing “linear objects, in a pattern”. This description is indicative of a potential target area. This AOC should be reclassified as a target area.

UXB Grid 289. A 105mm UXO was found in this grid during the UXB investigation. This is not noted in the Level 1 form. This AOC should be reclassified as a target area.

Firing Point Comments

General Comment on Mortar Firing Positions. Since the original evidence for these positions was a hand drawn map, it would be helpful to document (either in the reconnaissance report or the Level 1 screen worksheets) the rationale for the determinations that the areas investigated during the 2001 Reconnaissance were in fact the locations of these firing points. Also see comment on Mortar Firing Position #3.

Mortar Firing Position #1. The easting and northing coordinates for the center point of this area (item 3 on the Level 1 worksheet) do not seem to be correct.

Mortar Firing Position #3. Reconnaissance results classified terrain in this area as moderate to steep - this adds to uncertainty as to whether or not this is the actual location of this firing position.

OB/OD Area Comments

Demolition Area #1. Add reference to the surface clearance done by UXB in this area.

Training Area Comments

General Comment.

Maneuver Area Comments

General Comment. Please revise the graphic to show the boundaries of the East Perimeter Areas and the West Perimeter Areas. Either indicate the coordinates of these boundaries on the Level 1 worksheets for the areas, or reference the figure showing the areas.

